

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND  
LIMITED, ACCIPITER INVESTMENT 4 LIMITED,  
VERMILLION AVIATION (TWO) LIMITED,  
ACCIPITER HOLDINGS DAC, CARLYLE  
AVIATION MANAGEMENT LIMITED,  
MAVERICK AVIATION HOLDINGS LIMITED,  
MANCHESTER AVIATION FINANCE S.A.R.L.,  
VERMILLION AVIATION HOLDINGS LIMITED,  
WELLS FARGO TRUST COMPANY, N.A., solely in  
its capacity as OWNER TRUSTEE, and UMB BANK,  
N.A., solely in its capacity as OWNER TRUSTEE,

Defendants.

Case No. 1:22-cv-02943 (PAE)

**[PROPOSED] ORDER TO  
SHOW CAUSE FOR  
TEMPORARY  
RESTRAINING ORDER  
AND PRELIMINARY  
INJUNCTION**

Upon the motion for a temporary restraining order and preliminary injunction, supported by the Declaration of Howard Diamond and Paul Lambert, together with the exhibits annexed thereto, the memorandum of law of Plaintiff Frontier Airlines Inc. (“Plaintiff”), and the pleadings herein, and good and sufficient cause appearing therefor, it is hereby:

**ORDERED**, that Defendants Wells Fargo Trust Company, N.A. and UMB Bank, N.A., each solely in their capacity as owner trustee (“Defendants”), show cause before a motion term of this Court at Room \_\_\_\_, United States Courthouse, 500 Pearl Street, in the City of New York, State of New York, on the \_\_\_\_ of \_\_\_\_, 2023, at \_\_\_\_ m, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining the Defendants during the pendency of this Action from grounding,

impounding and/or deregistering any of the fourteen Aircraft that are the subject of this lawsuit (the “Aircraft”) or terminating the lease agreements for any of the Aircraft; and it is further

**ORDERED**, that until Plaintiff’s application for an injunction is decided by this Court, Defendants are restrained from impounding, grounding and/or deregistering any of the Aircraft or terminating the lease agreements for any of the Aircraft; and it is further

**ORDERED**, that Plaintiff serve Defendants this Order and their application for a temporary restraining order and preliminary injunction by email upon counsel of record for Defendants no later than the close of business today, and file proof of service on the docket of this case; and it is further

**ORDERED**, that Defendants shall respond to Plaintiff’s application by no later than \_\_\_\_\_, \_\_\_\_\_, 2023, at \_\_\_\_\_ m.

**SIGNED** this \_\_\_\_ day of \_\_\_\_\_, 2023.

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HON. PAUL A. ENGELMAYER  
United States District Judge